

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
DANIEL SIGUACHI (AND WIFE, NARCISA Z.  
SIGUACHI)

Plaintiffs,

-against-

41 MADISON LP/RUDIN MGMT CO, ET AL

Defendant.

See Rider Attached.

Case No.:  
21 MC 102 (AKH)

Docket No.: 07CV01705

NOTICE OF ADOPTION OF  
ANSWER TO MASTER  
COMPLAINT

-----X Jury Trial Demanded

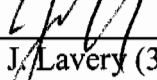
Defendant, LIBERTY STREET REALTY, by their attorneys, CALLAN, KOSTER, BRADY & BRENNAN, LLP, adopts its Answer to the Master Complaint served by the answering defendants in 21 MC 102 (AKH) as its answer to the allegations set forth in the Complaint by Adoption (Check-Off Complaint). Pursuant to Case Management Order No. 4, this adoption of answer to the Master Complaint is deemed to deny the allegations of the Check-Off Complaint in this case. To the extent that defendant's Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above caption matter, defendant denies knowledge or information sufficient to form a belief as to the truth of such specific allegations.

Wherefore, the defendant demands judgment dismissing the above captioned action, together with its costs and disbursements.

Dated: New York, New York  
June 4, 2008

Yours etc.,

CALLAN, KOSTER, BRADY & BRENNAN, LLP  
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REALTY

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**RIDER**

DANIEL SIGUACHI AND NARCISA Z  
SIGUACHI,

Plaintiffs,

- against -

41 MADISON LP/ RUDIN MGMT CO, 80 PINE  
LLC, AIG REALTY, INC., ALAN KASMAN  
DBA KASCO, AMERICAN INTERNATIONAL  
GROUP, INC., AMERICAN INTERNATIONAL  
REALTY CORP., ANN TAYLOR STORES  
CORPORATION, BANK OF NEW YORK,  
BATTERY PARK CITY AUTHORITY,  
BLACKMON-MOORING-STEAMATIC  
CATASTROPHE, INC. D/B/A BMS CAT,  
BROOKFIELD FINANCIAL PROPERTIES, INC.,  
BROOKFIELD FINANCIAL PROPERTIES, LP,  
BROOKFIELD PARTNERS, LP, BROOKFIELD  
PROPERTIES CORPORATION, BROOKFIELD  
PROPERTIES HOLDINGS INC., ENVIROTECH  
CLEAN AIR, INC., GPS ENVIRONMENTAL  
CONSULTANTS, INC., HILLMAN  
ENVIRONMENTAL GROUP, LLC., INDOOR  
ENVIRONMENTAL TECHNOLOGY, INC.,  
KASCO RESTORATION SERVICES CO.,  
KENYON & KENYON, LIBERTY STREET  
REALTY, LOGANY LLC, MERRILL LYNCH &  
CO, INC., NOMURA HOLDING AMERICA,  
INC., NOMURA SECURITIES  
INTERNATIONAL, INC., ONE BROADWAY,  
LLC, RECTOR OF TRINITY CHURCH, RUDIN  
MANAGEMENT CO. INC., STRUCTURE TONE  
(UK), INC., STRUCTURE TONE GLOBAL  
SERVICES, INC., TOSCORP INC., TUCKER  
ANTHONY, INC., VERIZON NEW YORK, INC,  
WESTON SOLUTIONS, INC., WFP TOWER A  
CO., WFP TOWER A CO. G.P. CORP., WFP  
TOWER A. CO., L.P., WFP TOWER B CO. G.P.  
CORP., WFP TOWER B HOLDING CO., LP,  
WFP TOWER B. CO., L.P., WFP TOWER D CO.  
G.P. CORP., WFP TOWER D HOLDING CO. I  
L.P., WFP TOWER D HOLDING CO. II L.P.,  
WFP TOWER D HOLDING I G.P. CORP., AND  
WFP TOWER D. CO., L.P., ET AL

Defendants.

X